

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

ERIC CHAUSSE,)
PLAINTIFF,)
)
V.)
)
CEC Food And Beverage LLC,)
Le Cordon Bleu College Of Culinary)
Arts In Chicago, The Cooking And)
Hospitality Institute Of Chicago, Inc.,)
and Career Education Corporation,)
DEFENDANTS,)

COMPLAINT AT LAW AND JURY DEMAND

INTRODUCTION

1. Plaintiff Eric Chausse is legally blind and a resident of Chicago, Illinois. Mr. Chausse is bringing this action to seek redress for injuries suffered because of Defendants discriminatory denial of public accommodations.

JURISDICTION AND VENUE

2. The Court has primary jurisdiction over Plaintiffs' federal claim pursuant to 28 U.S.C. § 1331 and § 1343(a)(4). The Court has supplemental jurisdiction over Plaintiffs' state law claims pursuant to 28 U.S.C. § 1337.
3. Venue is proper pursuant to 28 U.S.C. § 1331 because the events giving rise to these claims occurred in this District and Defendants reside in this District.

PARTIES

4. Plaintiff is 25 years old, residing in Chicago, Illinois.
5. Plaintiff is legally blind.
6. Defendants are a corporation organized under the laws of the State of Illinois, and doing business in Illinois.
7. Defendants, CEC Food And Beverage LLC, Le Cordon Bleu College Of Culinary Arts In Chicago, The Cooking And Hospitality Institute Of Chicago, Inc., and Career Education Corporation, are headquartered in Schaumburg or Hoffman Estates, Illinois.

FACTS

8. Mr. Chausse has a disability, he is blind.
9. He applied to Defendants' cooking school (Le Cordon Bleu) to become a chef.
10. Le Cordon Bleu is a leader in the culinary arts with a well-known name and quality reputation in the culinary and hospitality industry. It has a tradition of over 100 years.
11. Defendants believed Mr. Chausse has a disability.
12. Because of Mr. Chausse's disability or because Defendants believe he has a disability, Mr. Chausse was denied access to Defendants' programs.
13. On October 15, 2014, Defendants sent a letter to Mr. Chausse informing him that he is "not eligible or qualified for admission" because he was blind.

14. Defendants meet the requirement of an accommodation as set forth in the law, 42 USCS §§12181, 12182 et seq., 36 CFR Ch.1, Part 36 et seq., and 775 ILCS 5/5-101.

15. Mr. Chausse could have graduated from Defendants' school with reasonable accommodations.

16. There is a history of blind chefs in America, such as MasterChef Christine Ha, and Chicago restaurateur and chef Laura Martinez.

Wherefore, Eric Chausse prays that this Honorable Court order:

- A. Defendants to cease discriminating against Eric Chausse, and order Defendants to make reasonable accommodations for his classes at Defendants' business,
- B. Defendants to pay Eric Chausse \$10,000,000.00 for compensatory damages, and
- C. Defendants to pay Eric Chausse's attorney's fees.

Plaintiff demands a jury trial on all issues.

Sincerely submitted,

/s/ Jeffrey M. Jacobson
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